



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 31, 1995

MEMORANDUM

TO: John Krause, Bureau of Indian Affairs

FROM: Alisa Wong, Cynthia Sans, and John Hillenbrand, EPA

RE: Duck Valley Work Plan

The following are comments to the draft Work Plan and Field Sampling and Analysis Plan submitted by the Bureau of Indian Affairs (BIA) to the U.S. Environmental Protection Agency, Region 9 (EPA).

Work Plan

The two wells that are contaminated are currently unusable for a source of domestic drinking water supply or for monitoring because of long screens. They are presently a conduit for spreading contamination to lower parts of the aquifer or to other deeper aquifers. Immediately close drinking water well #1 (first priority) and #2 to prevent any further contamination.

Discontinue or reduce the use of drinking water well #3 to prevent the pulling of contaminant toward the two currently clean drinking water wells. According to the water system operator, Nate Bacon, drinking water well #4 does have the capacity to supply the community with all of their drinking water needs.

Match the chemistry of groundwater contaminant with the source area. Sample all petroleum hydrocarbon materials in tanks and well to use as the standard by which groundwater samples will be matched. Original chromatographs of these should be submitted.

Field Sampling and Analysis Plan

Excavation and sampling work should be photographed to give a picture of the contamination and the work being done. Photographs should accompany **biweekly?** updates to work.

Before any excavation occurs, all parts (discharge line, pipeline..etc, should be drained of all waste fluids and solids.

Address disposal...discuss land farming.

To: Patricia Eklund
cc: (bcc: Alisa Wong)
From: Doris Betuel
Date: 10/30/95 03:12:51 PM
Subject: Duck Valley

Pat, here's some information on the problems we've had with the Duck Valley efforts.

Your section issued UST enforcement letters to BIA, Elko school district, and Texaco on 4/11/95.

We issued an emergency UIC order to BIA on June 16, 1995 requiring BIA to cease injection of their wastes, close the injection well, characterize the integrity and extent of contamination originating from a 16,000 gallon AST and associated pipeline, sample drinking water and remediate the site.

A draft workplan was submitted by BIA to clean-up the contamination on September 13 and a draft Sampling and Analysis Plan on September 15. These drafts represented the third drafts, as we had commented on earlier versions. To make their limited funds go further, BIA addressed both the UIC and UST concerns in their workplan. Time was (and is) of the essence if BIA is to do anything before the winter snows start. In addition, BIA has been very prompt and timely in their responses to us.

To date, neither Elko school district nor Texaco have responded to the UST enforcement letters. Because the UST portion of the BIA clean-up is directly affected by the contribution from the Elko and Texaco sites, we asked your staff to accelerate their activities. From May to present, my staff has grown increasingly frustrated with the lack of priority given to addressing these sites. Phone calls would go unanswered, be returned 2-3 weeks later, or only if we made repeated attempts to contact staff. We finally resorted to cc'ing you on voicemail/pmail messages on occasion -- and still made limited progress.

For example, we understood that your staff wanted to make a site visit before moving forward. Starting in July, we had numerous meetings with your staff to review the workplans, discuss the next steps to address all the UIC/UST concerns, and schedule a joint August inspection visit of the BIA and other sites. At the last minute, your staff canceled due to illness, but we are unaware of any further plans by your staff to visit the site.

We went ahead with the site visit and are convinced that the BIA is ready to move forward with a reasonable clean-up plan. Due to a lack of past priority by the UST program, the Alexis-Laura memo was intended to get UST involved either as a committed participant or for UST to allow the UIC program to move forward as project lead to address both UIC/UST violations.

The gist of the situation is Duck Valley is a priority for the UIC program and didn't appear to be so for the UST staff. But based upon our conversation last week, I'm hopeful that we can work through the past staff frustrations and move forward to address the Duck Valley situation.

Please let me know if you have any questions.

Doris



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

MEMORANDUM

Subject: Attempts to Communicate/Get Follow-Up With UST Regarding Duck Valley

From: Cynthia Sans *CS*

To: Doris Betuel

Date: October 27, 1995

The following summarizes the situation which led up to the memo from Alexis to Laura. Alisa and I hope that this won't produce an awkward situation between the divisions or staff but that we can find a way to work closely with UST in an effort to expedite work at Duck Valley.

- 1) UST issued enforcement letters (not orders) to BIA, Elko School District and a former Texaco station on April 18, 1995 requiring integrity testing and product inventories of USTs owned and operated by each of these entities. BIA included the UST requirements in the workplan they wrote in response to the emergency order. Elko and Texaco have not responded. UST planned to go on site with us in August but couldn't make it. We were told that they have not made other attempts to get in touch with the respondents and won't do so until a site visit can be arranged. Our attempts to encourage some action went unheeded even though we expressed that the sources owned by different entities should be addressed at the same time so that BIA doesn't waste their time and money.
- 2) Phone calls to Matt and Walt went unanswered or it took a long time to get a response. There were perhaps 6 or 8 calls. One or two were sent to Pat Eklund in addition to staff. Two examples of calls to Matt and/or Walt were calls made on 9/8 (walt) and 9/27 (matt and walt).
- 3) Some PMAILS were also sent. Matt answered a 10/6 PMAIL on 10/20. A few PMAILS were sent to Pat as a cc. I'm not sure if they responded to these at all or promptly as this was a while ago.



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REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 25, 1995

MEMORANDUM

TO: John Krause, Bureau of Indian Affairs

FROM: Alisa Wong, Cynthia Sans

RE: Duck Valley Work Plan

1. Close drinking water wells #1 and #2. Drinking water well #1 is slotted at two intervals which suggests that a confining layer exists between the slotted layers therefore cross-contamination of the lower drinking water aquifer is possible and imminent if drinking water well #1 should remain open.
2. To prevent the pulling of contamination to other drinking water wells, the use of drinking water #3 should be discontinued or reduced as much as possible.
3. Installation of a monitoring well to protect and ensure the drinking water supply is safe.
4. Closure of the Class V well located in the Road Shop to prevent more contaminant from entering the ground or groundwater.
5. Investigate all other possible pathways for further contamination and close them.
6. Remove free product from groundwater.
7. Remove contaminated surface soils (to prevent direct indigestion by children).

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Class V well. It is unclear whether BIA is planning to immediately remove the well and all associated parts or investigate then remove the well if necessary. Please clarify.

Cleanup of the floor of the Road Shop Building should be done after clean up of the Class V well not before.

For the excavation of the Class V well and surrounding soils, instead of conducting sampling before excavating the drain lines, excavate until visible contamination has been removed, then take confirmation samples.

Along the heating fuel pipeline, there is some inconsistency as to whether TPH or TRPH will be sampled. Please clarify

Not necessary to take Atterberg limit test.

Take one sample of groundwater in the aquifer to the depth of the lowermost screen. It is not acceptable to take this sample from the drinking water well unless the top portion of the screen can be closed. (Talk to Cynthia and John)

The following geophysical logging methods proposed are not effective for cased wells--caliper, neutron, single-point resistance, spontaneous potential and conductivity logs. Acoustic velocity, gamma ray, or temperature logs would be more effective.

A composite sample can be taken of the waste liquid and solid in the well (?).

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